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UNDER
SEAL

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

Case No. 3:19-cr-00436-SI

v.

INDICTMENT

SAMUEL DIAZ, a.k.a. Pariente,

21 U.S.C. §§ 841(a)(1),
841(b)(1)(A), 841(b)(1)(B),
841(b)(1)(C), 843(b), 846,
and 856(a)(1)

FAUSTINO MONROY, a.k.a. Manuel,
a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino,

EDGAR OMAR QUIROZ RODRIGUEZ,
a.k.a. Nano, a.k.a. Marcelino Zambrano
Rodriguez, a.k.a. Midget,

18 U.S.C. §§ 922(g)(1), 922(g)(2),
922(g)(5), 924(c) and 1956(h)

GERSON FERNANDO MARTINEZ-
CRUZ, a.k.a. Shaggy,

Forfeiture Allegations

JESUS GONZALEZ VAZQUEZ,
a.k.a. Chuy,

UNDER SEAL

JUAN ANTONIO ROMO, a.k.a. Tony,

CRISTIAN HANGUIN FERNANDEZ,
a.k.a. Barbas,

MANUEL HERNANDEZ GABRIEL,
a.k.a. Burras,

JOHN DOE, a.k.a. Michocano,

FELIPE DeJESUS SARCO GOMEZ,

YENIRA SANDOVAL,

Indictment

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CONSUELO MORALES RAMIREZ,

YUNUHEN SALAZAR ANDRADE,

LINDSAY ANN MARKS,

OBED VILLA SENOR SANTOS,

**MANUEL SANCHEZ CORADO,
a.k.a. Little Man,**

**CHRISTOPHER GALLEGOS,
a.k.a. Lucky,**

EDUARDO MARTINEZ-PEREZ,

MARINA MARTINEZ MALDONADO,

BRYCE MATTHEW HERSEL,

SEAN ROSS CRAWLEY, a.k.a. Creeper,

TRACY NICHOLS,

JUSTIN KYLE MUNSEY,

GERALD RICHARDS,

TRAVIS MERRELL,

WILLIAM SUITER,

RICK DALHOVER,

MARTIN ANTONIO AGUAYO,

**TERESITA ENCISO-ROJAS,
a.k.a. Tere,**

ROY SHAW,

JASON BARRETH,

TERINA McCORD,

TIA ROUSE,

**JASON MICHAEL BLYTHE,
a.k.a. JDog,**

DONALD LEE BEASLEY,

**MATTHEW BENNETT,
a.k.a. Pikos, a.k.a. Burro,**

CHAD JACOB CULLEN, a.k.a. Flavel,

GREGORY FISH,

ANGEL BARRERA,

MAYRA ESPINO, and

BRUCE ANTHONY SHIRLEY,

Defendants.

THE GRAND JURY CHARGES:

COUNT 1

(Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine, Heroin and Cocaine; to Use Communication Facilities in Furtherance of the Conspiracy; and, to Maintain Premises to Distribute Controlled Substances)

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), 841(b)(1)(C), 843(b), 846, 856(a)(1), and 856(b))

Introduction

1. As set forth below, the defendants engaged in a vast international drug smuggling and money laundering conspiracy. As part of the drug smuggling operation, leaders of the drug trafficking organization caused significant amounts of controlled substances, including hundreds of kilograms of heroin, and methamphetamine to be transported from Mexico to the greater Portland, Oregon area for local distribution. These drugs had a total wholesale value of millions of dollars. As part of the money laundering operation, the drug trafficking organization used

money transmitting businesses and their agents to wire substantial amounts of cash generated from the Portland drug trafficking activity to various nominees in Mexico and in the United States. The wire transactions were coordinated and structured under the pretense of legal transactions to conceal the illicit nature of the proceeds and the identity of those involved in the drug trafficking activity.

The Conspiracy

2. Beginning on or about November 2018, the exact date being unknown to the grand jury, and continuing through September 24, 2019, within the District of Oregon and elsewhere, defendants **SAMUEL DIAZ, a.k.a. Pariente, FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino, EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget, GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy, JESUS GONZALEZ VAZQUEZ, a.k.a. Chuy, JUAN ANTONIO ROMO, a.k.a. Tony, CRISTIAN HANGUIN FERNANDEZ, a.k.a. Barbas, MANUEL HERNANDEZ GABRIEL, a.k.a. Burras, JOHN DOE, a.k.a. Michocano, FELIPE DeJESUS SARCO GOMEZ, YENIRA SANDOVAL, CONSUELO MORALES RAMIREZ, YUNUHEN SALAZAR ANDRADE, LINDSAY ANN MARKS, OBED VILLA SENOR SANTOS, MANUEL SANCHEZ CORADO, a.k.a. Little Man, CHRISTOPHER GALLEGOS, a.k.a. Lucky, EDUARDO MARTINEZ-PEREZ, MARINA MARTINEZ MALDONADO, BRYCE MATTHEW HERSEL, SEAN ROSS CRAWLEY, a.k.a. Creeper, TRACY NICHOLS, JUSTIN KYLE MUNSEY, GERALD RICHARDS, TRAVIS MERRELL, WILLIAM SUITER, RICK DALHOVER, MARTIN ANTONIO AGUAYO, TERESITA ENCISO-ROJAS, a.k.a. Tere, ROY SHAW, JASON BARRETH, TERINA McCORD, TIA ROUSE, JASON MICHAEL BLYTHE, a.k.a. JDog, DONALD LEE**

BEASLEY, MATTHEW BENNETT, a.k.a. Pikos a.k.a. Burro, CHAD JACOB CULLEN, a.k.a. Flavel, GREGORY FISH, ANGEL BARRERA, MAYRA ESPINO, and BRUCE ANTHONY SHIRLEY, did knowingly and intentionally combine, conspire, confederate, and agree with each other and with others both known and unknown to the Grand Jury, to carry out the following objects in furtherance of the conspiracy:

Objects of the Conspiracy

1. **Distribution of Methamphetamine:** The conspirators did knowingly and intentionally combine, conspire, confederate, and agree to distribute 500 grams or more of a mixture and substance containing a detectible amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).
2. **Possession with the Intent to Distribute Methamphetamine:** The conspirators did knowingly and intentionally combine, conspire, confederate, and agree to possess with intent to distribute 500 grams or more of a mixture and substance containing a detectible amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).
3. **Distribution of Heroin:** The conspirators did knowingly and intentionally combine, conspire, confederate, and agree to distribute one kilogram or more of a mixture and substance containing a detectible amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).
4. **Possession with the Intent to Distribute Heroin:** The conspirators did knowingly and intentionally combine, conspire, confederate, and agree to possess with intent to distribute one kilogram or more of a mixture and substance containing a detectible amount of

heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

5. **Distribution of Cocaine:** The conspirators did knowingly and intentionally combine, conspire, confederate, and agree to distribute a mixture and substance containing a detectible amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

6. **Possession with the Intent to Distribute Cocaine:** The conspirators did knowingly and intentionally combine, conspire, confederate, and agree to possess with intent to distribute a mixture and substance containing a detectible amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

7. **Use of a Communication Facility in Facilitating a Drug Trafficking Offense:** The conspirators did knowingly and intentionally combine, conspire, confederate, and agree to use communication facilities, to-wit: cellular telephones, in committing, causing, or facilitating the commission of a felony controlled substance offense under Title 21, United States Code, Section 841(a)(1), to-wit: the distribution and possession with the intent to distribute a controlled substance, and in violation of Title 21, United States Code, Section 843(b).

8. **Maintaining Drug-Involved Premises:** The conspirators did knowingly and intentionally combine, conspire, confederate, and agree to open, leave, rent, use and maintain any place, whether permanently or temporarily, for the purpose of manufacturing, distributing and using any controlled substance, in violation of Title 21, United States Code, Sections 856(a)(1) and 856(b).

Manner and Means of the Conspiracy

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

1. It was part of this conspiracy for certain of the defendants and others to transport, store, distribute, conceal, and possess with the intent to distribute the controlled substances methamphetamine and heroin for purposes of further distribution.

2. It was part of this conspiracy for certain of the defendants and others to utilize cellular telephones to further the possession and distribution of the controlled substances, including methamphetamine, heroin, and cocaine, and to use coded language to communicate with each other in the course of the conspiracy.

3. It was part of this conspiracy for certain of the defendants and others to process, store, weigh, and package the controlled substances methamphetamine and heroin for distribution.

4. It was part of this conspiracy for certain of the defendants and others to maintain premises for the purposes of storing, packaging, possessing, and distributing the controlled substances methamphetamine and heroin.

5. It was part of this conspiracy to use and maintain motor vehicles to transport the controlled substances methamphetamine and heroin, money, and co-conspirators, to facilitate drug transactions, and to employ counter-surveillance methods while driving or during the conduct of transactions, in the course of possessing with intent to distribute and distributing the controlled substances methamphetamine and heroin and transporting drug proceeds.

6. It was part of this conspiracy to use money remitting services to facilitate drug transactions and payment for the controlled substances methamphetamine and heroin.

7. It was part of this conspiracy to provide physical locations for conspirators to store, process, and organize the distribution of the controlled substances methamphetamine and heroin.

Overt Acts

In furtherance of this conspiracy, and to effect and accomplish its objectives, the defendants and other co-conspirators committed one or more of the following overt acts as well as the acts outlined below in Counts 2 through 60, which are hereby incorporated by reference:

Leaders and Managers

1. Beginning on or about November 2018, the exact date being unknown to the grand jury, and continuing through September 24, 2019, defendants **SAMUEL DIAZ, a.k.a. Pariente** and **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vefon, a.k.a. Tino**, while residing in Mexico and utilizing their associations with criminal organizations based in Mexico, California, and elsewhere, organized, led, and ran an international drug trafficking organization in which they obtained and then coordinated the distribution and possession with the intent to distribute hundreds of kilograms of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and hundreds of kilograms of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, worth millions of dollars, to other drug dealers for further distribution within the greater Portland, Oregon metropolitan area and elsewhere.

2. Beginning on or about November 2018, the exact date being unknown to the grand jury, and continuing through September 24, 2019, defendants **EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget** and **GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy** managed, supervised, and

coordinated day to day operations of the drug trafficking organization led by defendants **SAMUEL DIAZ, a.k.a. Pariente** and **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino**, by receiving and fulfilling orders from customers who were collectively purchasing as much as 35 kilograms of a mixture and substance containing methamphetamine and 25 kilograms of a mixture and substance containing heroin per week, for the purposes of further distribution. After receiving orders from customers, defendants **EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget** and **GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy** would either direct couriers to deliver the drugs or personally deliver the drugs to the customers themselves.

3. Beginning on or about November 2018, the exact date being unknown to the grand jury, and continuing through September 24, 2019, defendants **EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget** and **GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy** would either direct couriers to collect proceeds from the sale of drugs or collect the drug proceeds themselves.

4. Beginning on or about November 2018, the exact date being unknown to the grand jury, and continuing through September 24, 2019, defendants **EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget** and **GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy** would deliver or direct others to deliver drug proceeds to defendants **JESUS GONZALEZ VAZQUEZ, a.k.a. Chuy** and **JUAN ANTONIO ROMO, a.k.a. Tony** to facilitate drug transactions and payment for controlled substances.

5. Beginning on or about November 2018, the exact date being unknown to the grand jury, and continuing through September 24, 2019, defendant **JESUS GONZALEZ**

VAZQUEZ, a.k.a. Chuy would help to broker and arrange the distribution and possession with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance between various sources of supply and **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino** and **EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget.**

Sources of Supply

6. Beginning on or about November 2018, the exact date being unknown to the grand jury, and continuing through September 24, 2019, defendants **CRISTIAN HANGUIN FERNANDEZ, a.k.a. Barbas, JOHN DOE, a.k.a. Michocano, and MANUEL HERNANDEZ GABRIEL, a.k.a. Burras** as well as others known and known, operated within the District of Oregon and elsewhere, as sources of supply distributing and possessing with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine and/or one kilogram or more of a mixture and substance containing a detectable amount heroin, for the purposes of further distribution to members of the drug trafficking organization run by defendants **SAMUEL DIAZ, a.k.a. Pariente and FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino.**

Arming Members of the Drug Trafficking Organization

7. Beginning on or about November 2018, the exact date being unknown to the grand jury, and continuing through May 6, 2019, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino, JESUS GONZALEZ VAZQUEZ, a.k.a. Chuy, and EDUARDO MARTINEZ-PEREZ** obtained and attempted to obtain rifles and

handguns from within the United States for the purpose of sending the firearms to individuals in Mexico in an effort to strengthen and protect their drug trafficking organization and activities.

Drug Couriers and Money Collectors

Interstate Drug Couriers

8. Beginning on or about November 2018, the exact date being unknown to the grand jury, and continuing through September 24, 2019, defendants **FELIPE DeJESUS SARCO GOMEZ, YENIRA SANDOVAL, and CONSUELO MORALES RAMIREZ** operated as interstate couriers transporting quantities of methamphetamine and/or heroin from California to members of the drug trafficking organization, run by defendants **SAMUEL DIAZ, a.k.a. Pariente and FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vefon, a.k.a. Tino**, in Oregon and elsewhere for purposes of further distribution.

Local Drug Couriers

9. Beginning on or about November 2018, the exact date being unknown to the grand jury, and continuing through September 24, 2019, defendants **GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy, YUNUHEN SALAZAR ANDRADE, LINDSAY ANN MARKS, OBED VILLA SENOR SANTOS, MANUEL SANCHEZ CORADO, a.k.a. Little Man, CHRISTOPHER GALLEGOS, a.k.a. Lucky, EDUARDO MARTINEZ-PEREZ, MARINA MARTINEZ MALDONADO, and BRYCE MATTHEW HERSEL**, operated as drug couriers for the drug trafficking organization run by defendants **SAMUEL DIAZ, a.k.a. Pariente and FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vefon, a.k.a. Tino**, by distributing and possessing with the intent to distribute as much as 35 kilograms of a mixture and substance containing methamphetamine and 25 kilograms of a mixture and

substance containing heroin per week to various co-conspirators within the greater Portland metropolitan area, for the purposes of further distribution.

10. Beginning on or about November 2018, the exact date being unknown to the grand jury, and continuing through September 24, 2019, defendants **GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy, YUNUHEN SALAZAR ANDRADE, LINDSAY ANN MARKS, OBED VILLA SENOR SANTOS, MANUEL SANCHEZ CORADO, a.k.a. Little Man, CHRISTOPHER GALLEGOS, a.k.a. Lucky, EDUARDO MARTINEZ-PEREZ, MARINA MARTINEZ MALDONADO, and BRYCE MATTHEW HERSEL** operated as money collectors, collecting payment for drugs that had been purchased from the drug trafficking organization.

Residences Used to Store Methamphetamine and Heroin for

Purposes of Further Distribution

11. Beginning on or about November 2018, the exact date being unknown to the grand jury, and continuing through September 24, 2019, defendants **GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy, YUNUHEN SALAZAR ANDRADE, LINDSAY ANN MARKS, OBED VILLA SENOR SANTOS, MANUEL SANCHEZ CORADO, a.k.a. Little Man, CHRISTOPHER GALLEGOS, a.k.a. Lucky, EDUARDO MARTINEZ-PEREZ, MARINA MARTINEZ MALDONADO, BRYCE MATTHEW HERSEL, SEAN ROSS CRAWLEY, a.k.a. Creeper, TRACY NICHOLS, JUSTIN KYLE MUNSEY, GERALD RICHARDS, TRAVIS MERRELL, WILLIAM SUITER, RICK DALHOVER, MARTIN ANTONIO AGUAYO, TERESITA ENCISO-ROJAS, a.k.a. Tere, ROY SHAW, JASON BARRETH, TERINA McCORD, TIA ROUSE, JASON MICHAEL BLYTHE, a.k.a. JDog, DONALD LEE BEASLEY, MATTHEW BENNETT, a.k.a. Pikos, a.k.a. Burro, CHAD**

JACOB CULLEN, a.k.a. Flavel, and ANGEL BARRERA maintained residences and premises (“stash houses”) for the purpose of storing and distributing methamphetamine and/or heroin within the greater Portland, Oregon metropolitan area.

Local Drug Dealers

12. Beginning on or about November 2018, the exact date being unknown to the grand jury, and continuing through September 24, 2019, defendants **SEAN ROSS CRAWLEY, a.k.a. Creeper, TRACY NICHOLS, JUSTIN KYLE MUNSEY, GERALD RICHARDS, TRAVIS MERRELL, WILLIAM SUITER, RICK DALHOVER, MARTIN ANTONIO AGUAYO, TERESITA ENCISO-ROJAS, a.k.a. Tere, ROY SHAW, JASON BARRETH, TERINA McCORD, TIA ROUSE, JASON MICHAEL BLYTHE, a.k.a. JDog, DONALD LEE BEASLEY, MATTHEW BENNETT, a.k.a. Pikos, a.k.a. Burro, CHAD JACOB CULLEN, a.k.a. Flavel, GREGORY FISH, ANGEL BARRERA, MAYRA ESPINO, and BRUCE ANTHONY SHIRLEY** possessed 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine and/or one kilogram or more of a mixture and substance containing a detectable amount heroin, obtained from their drug courier co-defendants, for purposes of further distribution within the District of Oregon and elsewhere.

13. Beginning on or about November 2018, the exact date being unknown to the grand jury, and continuing through September 24, 2019, defendants **SEAN ROSS CRAWLEY, a.k.a. Creeper, TRACY NICHOLS, JUSTIN KYLE MUNSEY, GERALD RICHARDS, TRAVIS MERRELL, WILLIAM SUITER, RICK DALHOVER, MARTIN ANTONIO AGUAYO, TERESITA ENCISO-ROJAS, a.k.a. Tere, ROY SHAW, JASON BARRETH, TERINA McCORD, TIA ROUSE, JASON MICHAEL BLYTHE, a.k.a. JDog, DONALD LEE BEASLEY, MATTHEW BENNETT, a.k.a. Pikos, a.k.a. Burro, CHAD JACOB**

CULLEN, a.k.a. Flavel, GREGORY FISH, and ANGEL BARRERA distributed 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine and/or one kilogram or more of a mixture and substance containing a detectable amount heroin within the District of Oregon and elsewhere.

Transfer of Drug Sale Proceeds

14. Beginning on or about November 2018, the exact date being unknown to the grand jury, and continuing through September 24, 2019, **JESUS GONZALEZ VAZQUEZ, a.k.a. Chuy**, and **JUAN ANTONIO ROMO, a.k.a. Tony**, operated a wire remitter business in Portland, Oregon, which they used to wire transfer proceeds of methamphetamine and/or heroin sales to other co-conspirators in Mexico and elsewhere in the United States.

General Acts by Conspirators

15. Defendants used cellular telephones to facilitate the distribution of methamphetamine, heroin, and cocaine in Oregon and elsewhere.

16. Defendants would periodically switch (“drop”) cellular telephones in an effort to thwart the investigative efforts of law enforcement. In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), 841(b)(1)(C), 843(b), 846, 856(a)(1) and 856(b).

COUNT 2
(Conspiracy to Commit Money Laundering)
(18 U.S.C. §1956(h))

All allegations in Count One are incorporated herein.

Background

1. Tienda Mexicana Gonzalez, Inc. (also known as “Gonzalez Bros.”) is a market located at 12441 S.E. Powell Boulevard, Portland, Oregon. As part of its business, Gonzalez Bros. offers services where customers, for a fee, can transmit money from the United States to

other locations, including Mexico. In order to transmit customer funds internationally, Gonzalez Bros. entered into agency agreements with various money transmitting businesses. These money transmitting businesses specialize in electronically wiring money and have agent locations throughout the United States and other countries, including Mexico. Gonzalez Bros. is authorized by wire transmitting companies to serve as an agent in Oregon to receive and transmit money to and from Mexico, and to other locations in the United States. Money transmitting businesses and its agents are required to maintain records accurately recording details of wire transactions, including customer information and amounts electronically wired. Banks accepting the cash deposits of money transmitting businesses and its agents are required to submit cash transaction reports and notify officials if customers are engaged in illegal or suspicious activity. This information is available to U.S. law enforcement and regulatory agencies to help combat illegal money laundering.

2. A legitimate wire transaction from the United States to Mexico and elsewhere in the United States typically involves a customer bringing in U.S. cash with a request to electronically transmit the funds to a recipient, oftentimes a relative in Mexico. The U.S. customer provides identity and transaction information, as required, including contact information of the sender in the United States and the recipient in Mexico or elsewhere. The wire transmitting business accepts the customer's cash, and uses the money transmitting business arrangement to generate a wire transaction electronically transferring the funds to the intended recipient in Mexico or elsewhere. The recipient then visits a money transmitting business agent in Mexico or elsewhere in the United States, presents proof of identity, and is given the funds, often in Mexican pesos.

3. As part of the money laundering conspiracy, defendants manipulated this otherwise lawful process by using the wire transmitting business services at Gonzalez Bros. to take cash generated from the drug trafficking organization and structure low denomination wire transactions to the drug trafficking organization in Mexico, and to other locations in the United States, under the pretense of legal wire transfers.

Objects of the Conspiracy

Beginning on or about November 2018, the exact date being unknown to the grand jury, and continuing through September 24, 2019, within the District of Oregon and elsewhere, defendants **SAMUEL DIAZ, a.k.a. Pariente, FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino, EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget, GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy, JESUS GONZALEZ VAZQUEZ, a.k.a. Chuy, JUAN ANTONIO ROMO, a.k.a. Tony, YUNUHEN SALAZAR ANDRADE, LINDSAY ANN MARKS, MANUEL SANCHEZ CORADO, a.k.a. Little Man, CHRISTOPHER GALLEGOS, a.k.a. Lucky, EDUARDO MARTINEZ-PEREZ, and BRYCE MATTHEW HERSEL**, and other persons whose identities are known and unknown to the grand jury, did knowingly combine, conspire, confederate, and agree to commit offenses against the United States in violation of Title 18, United States Code, Section 1956(h), that is:

(a) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce and involving the proceeds of the unlawful distribution of a controlled substance, a specified unlawful activity, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed in whole or in part to conceal and disguise the nature,

location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(b) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce and involving the proceeds of the unlawful distribution of a controlled substance, a specified unlawful activity, with the intent to promote the carrying on of specified unlawful activity, and knowing that the property involved in the transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

Manner and Means of the Conspiracy

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

1. Defendants **SAMUEL DIAZ, a.k.a. Pariente, FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino and EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget** directed other defendants to collect cash generated from illegal drug sales and to deliver it to Gonzalez Bros. This occurred on a regular basis during the conspiracy. The amount of weekly cash deliveries to Gonzalez Bros ranged between \$25,000-\$100,000.

2. Defendants **JESUS GONZALEZ VAZQUEZ, a.k.a. Chuy and JUAN ANTONIO ROMO, a.k.a. Tony** worked at and helped operate the wire transmitting service operations at Gonzalez Bros. They were notified by other members of the conspiracy, including **EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget** when other conspirators would be delivering cash from illegal drug sales to them at Gonzalez Bros.

3. Relying on instructions provided by other conspirators, defendants **GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy, YUNUHEN SALAZAR ANDRADE, LINDSAY ANN MARKS, MANUEL SANCHEZ CORADO, a.k.a. Little Man, CHRISTOPHER GALLEGOS, a.k.a. Lucky, EDUARDO MARTINEZ-PEREZ, and BRYCE MATTHEW HERSEL** took cash they knew to be proceeds of unlawful activity to Gonzalez Bros., and gave the proceeds to defendants **JESUS GONZALEZ VAZQUEZ, a.k.a. Chuy, and JUAN ANTONIO ROMO, a.k.a. Tony.**

4. Defendants **JESUS GONZALEZ VAZQUEZ, a.k.a. Chuy, and JUAN ANTONIO ROMO, a.k.a. Tony** counted the cash given to them by the cash couriers, notified other co-conspirators in Mexico that they had received the cash, and advised they were ready to begin the wire transfer process to transmit the proceeds to Mexico, and elsewhere in the United States.

5. To avoid detection by law enforcement and regulatory officials, defendants in Mexico and elsewhere, including **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino** provided a list of names to defendants **JESUS GONZALEZ VAZQUEZ, a.k.a. Chuy, and JUAN ANTONIO ROMO, a.k.a. Tony** to use in low denomination wire transfers to Mexico and elsewhere in the United States. Defendants **JESUS GONZALEZ VAZQUEZ, a.k.a. Chuy, and JUAN ANTONIO ROMO, a.k.a. Tony** then used those names to prepare and send wire transfers from Oregon to Mexico and elsewhere in the United States, structured in low denomination amounts, and designed to prevent law enforcement or regulatory anti-money laundering scrutiny.

6. Knowing that the funds involved proceeds of unlawful activity, defendants **JESUS GONZALEZ VAZQUEZ, a.k.a. Chuy, and JUAN ANTONIO ROMO, a.k.a. Tony**

provided false and misleading information on wire transmitting paperwork about the customers supposedly involved in the wire transactions from Oregon to Mexico and elsewhere in the United States.

7. After sending the wire transfers, defendants **JESUS GONZALEZ VAZQUEZ, a.k.a. Chuy**, and **JUAN ANTONIO ROMO, a.k.a. Tony** notified drug trafficking organization co-conspirators, including defendant **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vefon, a.k.a. Tino** that the unlawfully derived proceeds had been successfully transmitted to Mexico or elsewhere, and provided them with specifics of the wire transfers, allowing drug trafficking organization members in Mexico and elsewhere to redeem the laundered funds.

8. During the course of this conspiracy, defendants wire transferred substantial amounts of the proceeds of unlawful activity to Mexico and elsewhere in the United States. This was done to facilitate the drug trafficking activity set forth in Count One and to conceal and disguise the nature, location, source, ownership and control of the proceeds of the drug trafficking activity.

In violation of Title 18, United States Code, Section 1956(h).

COUNT 3
(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))

On or about February 6, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vefon, a.k.a. Tino, EDUARDO MARTINEZ-PEREZ**, and **MARINA MARTINEZ MALDONADO** did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 4
(Distribution of Heroin)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about February 8, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino, and EDUARDO MARTINEZ-PEREZ** did knowingly and intentionally distribute heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 5
(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))

On or about February 15, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino, and BRYCE MATTHEW HERSEL** did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 6
(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))

On or about February 15, 2019, within the District of Oregon, subsequent to the Count alleged above, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino, and BRYCE MATTHEW HERSEL** did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 7

(Distribution of Heroin)

(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about February 22, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino, and BRYCE MATTHEW HERSEL** did knowingly and intentionally distribute heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 8

(Distribution of Methamphetamine)

(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))

On or about February 27, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino, and BRYCE MATTHEW HERSEL** did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 9

(Distribution of Heroin)

(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about March 5, 2019, within the District of Oregon, defendant **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino**, did knowingly and intentionally distribute heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 10

**(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))**

On or about March 8, 2019, within the District of Oregon, defendant **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino**, did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 11

**(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))**

On or about March 26, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino**, and **YUNUHEN SALAZAR ANDRADE** did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 12

**(Distribution of Heroin)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))**

On or about March 26, 2019, within the District of Oregon, subsequent to the Count alleged above, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino**, and **YUNUHEN SALAZAR ANDRADE** did knowingly and intentionally distribute heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 13

**(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))**

On or about April 4, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino, EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget, and LINDSAY ANN MARKS** did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 14

**(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))**

On or about April 24, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino, GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy, EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget, and TERESITA ENCISO-ROJAS, a.k.a. Tere** did knowingly and intentionally distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

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COUNT 15
(Unlawful Possession of a Firearm)
(18 U.S.C. §§ 922(g)(2), 922(g)(5), and 924(a)(2))

On or about May 6, 2019, in the District of Oregon, defendant **EDUARDO MARTINEZ PEREZ**, unlawfully and knowingly possessed one or more of the following firearms, to-wit:

- A. Taurus Model PT92AFS bearing serial # TAX94375;
- B. Ruger 9mm handgun bearing serial #305-28019;
- C. American Tactical Imports Omni-Hybrid .223 assault rifle bearing serial #AN008072; and,
- D. Ruger 357 Revolver handgun bearing serial #176-51026,

which had previously been shipped or transported in interstate or foreign commerce, knowingly being a prohibited person, to-wit: an alien who was illegally and unlawfully present in the United States and who was a fugitive from justice;

In violation of Title 18, United States Code, Sections 922(g)(2), 922(g)(5), and 924(a)(2).

COUNT 16
(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about August 1, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vefon, a.k.a. Tino, EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget**, and **YUNUHEN SALAZAR ANDRADE** did knowingly and intentionally distribute methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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COUNT 17

**(Possession with the Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))**

On or about August 1, 2019, within the District of Oregon, defendant **CHAD JACOB CULLEN, a.k.a. Flavel** did knowingly and intentionally possess with the intent to distribute methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 18

**(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)
(18 U.S.C. § 924(c))**

On or about August 1, 2019, within the District of Oregon, defendant **CHAD JACOB CULLEN, a.k.a. Flavel** and in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), as set forth in Count 17, did knowingly possess a firearm, to-wit: a Hi-Point .380 caliber pistol;

In violation of Title 18, United States Code, Section 924(c).

COUNT 19

**(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))**

On or about August 1, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino, EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget, JOHN DOE a.k.a. Michocano, GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy, and YUNUHEN SALAZAR ANDRADE** did knowingly and intentionally distribute 50

grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 20

**(Possession with the Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))**

On or about August 1, 2019, within the District of Oregon, defendant **MATTHEW BENNETT, a.k.a. Pikos, a.k.a. Burro** did knowingly and intentionally possess with the intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 21

**(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))**

On or about August 2, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino, EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget, and MANUEL SANCHEZ CORADO, a.k.a. Little Man** did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

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COUNT 22

**(Possession with the Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))**

On or about August 2, 2019, within the District of Oregon, defendant **TIA ROUSE** did knowingly and intentionally possess with the intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 23

**(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))**

On or about August 3, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino, EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget, JOHN DOE a.k.a. Michocano, GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy, and YUNUHEN SALAZAR ANDRADE** did knowingly and intentionally distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 24

**(Possession with the Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))**

On or about August 3, 2019, within the District of Oregon, defendant **MATTHEW BENNETT, a.k.a. Pikos, a.k.a. Burro** did knowingly and intentionally possess with the intent

to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 25

(Attempted Possession with the Intent to Distribute Heroin)

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), and 846)

On or about August 4, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vefon, a.k.a. Tino, EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget, and YUNUHEN SALAZAR ANDRADE** did knowingly and intentionally attempt to possess with the intent to distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846.

COUNT 26

(Possession with the Intent to Distribute Heroin)

(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))

On or about August 4, 2019, within the District of Oregon, defendant **OBED VILLA SENOR SANTOS** did knowingly and intentionally possess with the intent to distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 27

(Distribution of Methamphetamine)

(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))

On or about August 7, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vefon, a.k.a. Tino, EDGAR OMAR**
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QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a.

Midget, and GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 28

(Distribution of Heroin)

(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about August 7, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vefon, a.k.a. Tino, EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget, and GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy**, did knowingly and intentionally distribute heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 29

(Distribution of Methamphetamine)

(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))

On or about August 8, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vefon, a.k.a. Tino, EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget, GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy, and LINDSAY ANN MARKS** did knowingly and intentionally distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 30

**(Possession with the Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))**

On or about August 8, 2019, within the District of Oregon, defendants **ROY SHAW** and **TERINA McCORD** did knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 31

**(Attempted Possession with the Intent to Distribute Heroin)
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), and 846)**

On or about August 8, 2019, within the District of Oregon, defendants **SAMUEL DIAZ**, **FAUSTINO MONROY**, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino, **EDGAR OMAR QUIROZ RODRIGUEZ**, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget, **CHRISTOPHER GALLEGOS**, a.k.a. Lucky, and **LINDSAY ANN MARKS** did knowingly and intentionally attempt to possess with the intent to distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846.

COUNT 32

**(Possession with the Intent to Distribute Heroin)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))**

On or about August 8, 2019, within the District of Oregon, defendant **YUNUHEN SALAZAR ANDRADE** did knowingly and intentionally possess with the intent to distribute

one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 33

**(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)
(18 U.S.C. § 924(c))**

On or about August 8, 2019, within the District of Oregon, defendant **YUNUHEN SALAZAR ANDRADE**, in furtherance of a drug trafficking crime for which she may be prosecuted in a court of the United States, that is, possession with the intent to distribute heroin, in violation of Title 21, United States Code, Section 841(a)(1), as set forth in Count 32, did knowingly possess a firearm, to-wit: Derringer .22 caliber double-shot pistol, serial number 463312;

In violation of Title 18, United States Code, Section 924(c).

COUNT 34

**(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))**

On or about August 16, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino**, and **LINDSAY ANN MARKS** did knowingly and intentionally distribute methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 35

**(Possession with the Intent to Distribute Heroin)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))**

On or about August 29, 2019, within the District of Oregon, defendant **CHRISTOPHER GALLEGOS, a.k.a. Lucky** did knowingly and intentionally possess with the intent to distribute
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one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 36

**(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)
(18 U.S.C. § 924(c))**

On or about August 29, 2019, within the District of Oregon, defendant **CHRISTOPHER GALLEGOS, a.k.a. Lucky**, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute heroin, in violation of Title 21, United States Code, Section 841(a)(1), as set forth in Count 35, did knowingly possess a firearm, to-wit: a Taurus .357 revolver, serial number MA44065;

In violation of Title 18, United States Code, Section 924(c).

COUNT 37

**(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))**

On or about September 10, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino** and **GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy** did knowingly and intentionally distribute methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 38

**(Distribution of Heroin)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))**

On or about September 11, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino** and **GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy** did knowingly and intentionally distribute

100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 39
(Possession with the Intent to Distribute Heroin)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))

On or about September 11, 2019, within the District of Oregon, defendant **GREGORY FISH** did knowingly and intentionally possess with the intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 40
(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))

On or about September 12, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vefon, a.k.a. Tino, GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy, and MANUEL SANCHEZ CORADO, a.k.a. Little Man** did knowingly and intentionally distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 41
(Possession with the Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))

On or about September 12, 2019, within the District of Oregon, defendants **ROY SHAW** and **TERINA McCORD** did knowingly and intentionally possess with the intent to distribute

500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 42
(Distribution of Heroin)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))

On or about September 12, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vefon, a.k.a. Tino, GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy,** and **MANUEL SANCHEZ CORADO, a.k.a. Little Man** did knowingly and intentionally distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 43
(Possession with the Intent to Distribute Heroin)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))

On or about September 12, 2019, within the District of Oregon, defendant **ROY SHAW** and **TERINA McCORD** did knowingly and intentionally possess with the intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 44
(Attempted Possession with the Intent to Distribute Heroin)
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), and 846)

On or about September 12, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vefon, a.k.a. Tino, GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy,** and **MANUEL SANCHEZ CORADO, a.k.a. Little Man**

Indictment

did knowingly and intentionally attempt to possess with the intent to distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846.

COUNT 45

**(Possession with the Intent to Distribute Heroin)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))**

On or about September 12, 2019, within the District of Oregon, defendants **CONSUELO MORALES RAMIREZ** and **MANUEL HERNANDEZ GABRIEL** did knowingly and intentionally possess with the intent to distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 46

**(Possession with the Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))**

On or about September 16, 2019, within the District of Oregon, defendant **DONALD LEE BEASLEY** did knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

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COUNT 47

**(Possession with the Intent to Distribute Heroin)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))**

On or about September 16, 2019, within the District of Oregon, defendant **DONALD LEE BEASLEY** did knowingly and intentionally possess with the intent to distribute heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 48

**(Possession with the Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))**

On or about September 16, 2019, within the District of Oregon, defendant **JASON MICHAEL BLYTHE, a.k.a. JDog** did knowingly and intentionally possess with the intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 49

**(Possession with the Intent to Distribute Heroin)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))**

On or about September 16, 2019, within the District of Oregon, defendant **JASON MICHAEL BLYTHE, a.k.a. JDog** did knowingly and intentionally possess with the intent to distribute heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 50

**(Felon in Possession of a Firearm)
(18 U.S.C. §§ 922(g)(1) and 924(a)(2))**

On or about September 16, 2019, in the District of Oregon, defendant **MICHAEL BLYTHE, a.k.a. JDog**, knowing that he had been previously convicted of a crime punishable by
Indictment

imprisonment for a term exceeding one year, specifically: Unlawful Delivery of Heroin, on or about September 14, 2018, in Washington County Circuit Court, State of Oregon, Case Number C142416CR, did knowingly and unlawfully possess the following firearm: a Smith & Wesson M&P-15 .556 caliber semiautomatic assault rifle, serial number SY37091, which had previously been shipped or transported in interstate or foreign commerce;

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 51

**(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))**

On or about September 18, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vefon, a.k.a. Tino** and **GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy** did knowingly and intentionally distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 52

**(Possession with the Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))**

On or about September 18, 2019, within the District of Oregon, defendant **MAYRA ESPINO** did knowingly and intentionally possess with the intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 53
(Distribution of Heroin)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))

On or about September 18, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vefon, a.k.a. Tino, GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy**, and **MANUEL SANCHEZ CORADO, a.k.a. Little Man** did knowingly and intentionally distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 54
(Possession with the Intent to Distribute Heroin)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))

On or about September 18, 2019, within the District of Oregon, defendant **BRUCE ANTHONY SHIRLEY** did knowingly and intentionally possess with the intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 55
(Distribution of Heroin)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))

On or about September 18, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vefon, a.k.a. Tino** and **GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy** did knowingly and intentionally distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 56
(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))

On or about September 18, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino** and **GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy** did knowingly and intentionally distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 57
(Possession with the Intent to Distribute Heroin)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))

On or about September 18, 2019, within the District of Oregon, defendant **ROY SHAW** did knowingly and intentionally possess with the intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 58
(Possession with the Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))

On or about September 18, 2019, within the District of Oregon, defendant **ROY SHAW** did knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 59

**(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))**

On or about September 18, 2019, within the District of Oregon, defendants **FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino, GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy** and **MANUEL SANCHEZ CORADO, a.k.a. Little Man** did knowingly and intentionally distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 60

**(Possession with the Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))**

On or about September 19, 2019, within the District of Oregon, defendant **SEAN ROSS CRAWLEY, a.k.a. Creeper** did knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**Criminal Forfeiture Allegation:
(Narcotics Offense)**

Upon conviction of a controlled substance offense listed above in Count 1, and Counts 3 through 14, 16-17, 19-32, 34-35, 37-49, and 51-60, defendants **SAMUEL DIAZ, a.k.a. Pariente, FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino, EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget, GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy, JESUS GONZALEZ VAZQUEZ, a.k.a. Chuy, JUAN ANTONIO ROMO, a.k.a. Tony,**

CRISTIAN HANGUIN FERNANDEZ, a.k.a. Barbas, MANUEL HERNANDEZ GABRIEL, a.k.a. Burras, JOHN DOE, a.k.a. Michocano, FELIPE DeJESUS SARCO GOMEZ, YENIRA SANDOVAL, CONSUELO MORALES RAMIREZ, YUNUHEN SALAZAR ANDRADE, LINDSAY ANN MARKS, OBED VILLA SENOR SANTOS, MANUEL SANCHEZ CORADO, a.k.a. Little Man, CHRISTOPHER GALLEGOS, a.k.a. Lucky, EDUARDO MARTINEZ-PEREZ, MARINA MARTINEZ MALDONADO, BRYCE MATTHEW HERSEL, SEAN ROSS CRAWLEY, a.k.a. Creeper, TRACY NICHOLS, JUSTIN KYLE MUNSEY, GERALD RICHARDS, TRAVIS MERRELL, WILLIAM SUITER, RICK DALHOVER, MARTIN ANTONIO AGUAYO, TERESITA ENCISO-ROJAS, a.k.a. Tere, ROY SHAW, JASON BARRETH, TERINA McCORD, TIA ROUSE, JASON MICHAEL BLYTHE, a.k.a. JDog, DONALD LEE BEASLEY, MATTHEW BENNETT, a.k.a. Pikos a.k.a. Burro, CHAD JACOB CULLEN, a.k.a. Flavel, GREGORY FISH, ANGEL BARRERA, MAYRA ESPINO, and BRUCE ANTHONY SHIRLEY, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, to include, but not limited to:

1. A sum of money representing the amount of proceeds obtained as a result of the offense, in the form of a money judgment.
2. Any specific bank accounts constituting drug proceeds or property facilitating the drug conspiracy or drug offense.
3. Any specific vehicles constituting drug proceeds or facilitating property.

Criminal Forfeiture Allegation
(Money Laundering)

Upon conviction of the money laundering offense listed above in Count 2, defendants **SAMUEL DIAZ, a.k.a. Pariente, FAUSTINO MONROY, a.k.a. Manuel, a.k.a. Compa, a.k.a. Vejon, a.k.a. Tino, EDGAR OMAR QUIROZ RODRIGUEZ, a.k.a. Nano, a.k.a. Marcelino Zambrano Rodriguez, a.k.a. Midget, GERSON FERNANDO MARTINEZ-CRUZ, a.k.a. Shaggy, JESUS GONZALEZ VAZQUEZ, a.k.a. Chuy, and JUAN ANTONIO ROMO, a.k.a. Tony, YUNUHEN SALAZAR ANDRADE, LINDSAY ANN MARKS, MANUEL SANCHEZ CORADO, a.k.a. Little Man, CHRISTOPHER GALLEGOS, a.k.a. Lucky, EDUARDO MARTINEZ-PEREZ, BRYCE MATTHEW HERSEL,** shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(1), all property, real or personal, involved in such offense and all property traceable to such offense, including but not limited to a money judgment.

Criminal Forfeiture Allegation
(Firearms)

Upon conviction of a firearm offense as alleged above in Counts 15, 18, 33, 36, and 50, defendants **EDUARDO MARTINEZ PEREZ, CHAD JACOB CULLEN, a.k.a. Flavel, YUNUHEN SALAZAR ANDRADE, CHRISTOPHER GALLEGOS, a.k.a. Lucky, and JASON MICHAEL BLYTHE, a.k.a. JDog** shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), the firearm(s) and ammunition involved in the offense, including but not limited to:

1. Hi-Point .380 caliber pistol;
2. Derringer .22 caliber double-shot pistol, serial number 463312;.
3. Taurus .357 revolver, serial number MA44065

4. Smith & Wesson M&P-15 .556 caliber semiautomatic assault rifle, serial number SY37091
5. Taurus Model PT92AFS bearing serial # TAX94375;
6. Ruger 9mm handgun bearing serial #305-28019.
7. American Tactical Imports Omni-Hybrid .223 assault rifle bearing serial #AN008072; and,
8. Ruger 357 Revolver handgun bearing serial #176-51026.

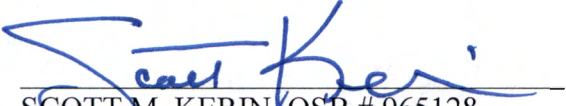
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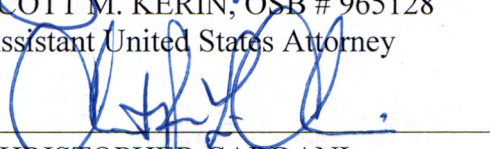
A TRUE BILL.

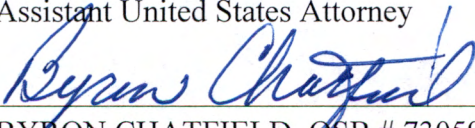

OFFICIATING FOREPERSON

Presented by:

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